

Law Office of G. Anthony Long
P. O. Box 504970, Beach Road
San Jose, Saipan, MP 96950
Tel. No. (670) 235-4802
Fax. No. (670) 235-4801

Attorney for Defendants

**IN THE UNITED STATES DISTRICT COURT
FOR THE
NORTHERN MARIANA ISLANDS**

GUIHUA BAI)	CIVIL ACTION NO. 07-0016
)	
Plaintiff)	
)	
v.)	
)	
GINTIAN CORPORATION, dba)	
LIGHT MASSAGE, ZHONG LI and)	CASE MANAGEMENT STATEMENT
"MR. ZHU")	OF DEFENDANTS
)	
Defendant.)	
)	
_____)	

Comes now defendants who submits the following proposed Case
Management Conference Statement:

(a) Service of Process:

Defendants have been properly served.

(b) Jurisdiction and Venue:

Subject matter Jurisdiction and venue is proper.

(c) Track Assignment:

Standard

(d) Anticipated motions:

The motions defendants anticipate filing include, but are not limited to the following:

1. Motion to amend answer;
2. Discovery motions;
3. Summary judgment motions.

(e) Anticipated Discovery and Limitation on Discovery:

1. Interrogatories will be served upon plaintiff by each defendant.
2. A request for Production of Documents will be served upon plaintiff by each defendant.
3. A Request for Admissions will be served upon plaintiff by each defendant.

3. Defendants anticipates taking, at least, the deposition of plaintiff.

Additional depositions may be taken of other persons who are later learned to possess discoverable knowledge through discovery.

(f) Further proceedings:

Defendants leave the setting of the proceedings to the court.

(g) Special Procedures:

Not necessary.

(h) Modification of the standard pre-trial procedures:

No modifications necessary.

(i) Settlement prospects:

Defendants believe a reasonable settlement may be possible.

(j) Limitation of issues:

No limitation is necessary, at this time.

(k) Setting of dates:

Defendants request the following dates:

1. Motions to amend and supplement pleadings filed on or before December 20, 2007;
2. All discovery served so as to be completed by February 29, 2008;
3. Discovery motions filed on or before March 7, 2008;
4. Settlement Conference on February 8, 2008;
3. All dispositive motions heard on or before April 18, 2008;
4. Final Settlement Conference on April 26, 2008;
5. Joint pre-trial order on May 1, 2008
6. Final Pre-trial conference May 6, 2008; and
4. Trial date of May 13, 2008 at 9:00 a.m.

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By: _____/s/_____
G. Anthony Long